

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-1139 (JKF)  
) Jointly Administered  
Debtors. )

Objection Deadline: July 22, 2002 at 4:00 p.m.  
Hearing Date: TBD only if necessary

**FEE DETAIL FOR WALLACE KING MARRARO &  
BRANSON PLLC'S MONTHLY FEE APPLICATION FOR  
THE PERIOD FROM MAY 1, 2002 THROUGH MAY 31, 2002**

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007  
Phone 202.204.1000  
Fax 202.204.1001

June 27, 2002

W. R. Grace & Co.  
Attention: Richard Senftleben  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12907

For Professional Services Rendered in Connection with Honeywell, Inc. Litigation - Matter 6

Professional Services:

		<u>Hours</u>
05/01/02	CHM Work on proposed stipulations (4.5 hrs.); review depositions (2.0 hrs.).	6.50
	MM Review recent correspondence for Mr. Marraro..	0.60
	WH Review new site photos and documents re surface water contamination and confer with non-testifying expert re same and site sampling issue (1.2 hrs.); revise database of trial exhibits (1.4 hrs.); conferences with Ms. Banks re new documents/exhibits (.6 hrs.); conference with expert re payment issue and follow-up re same (.6 hrs.); conference with groundwater expert re site sampling issue (.4 hrs.); review and collect new documents to be used as trial exhibits on site contamination and remediation issues (3.7 hrs.).	7.90
	BB Review and prepare site visit photos received from consultant for Mr. Hughes (.2 hrs.); arrange for duplication of same (.2 hrs.); continue incorporating new legal and fact analysis research, and pre-trial preparation	6.40

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		<u>Hours</u>
	issues research into electronic and indexed case files and create new files as appropriate (6.0 hrs.).	
05/02/02 NAB	Conduct Internet search for report re surface water (1.8 hrs.); format and print same to be added to "Surface Water Data" binder (1.1 hrs.); Scan case documents (1.9 hrs.); incorporate same into electronic files (.9 hrs.); create hyperlinks for same on the appropriate case indices (1.8 hrs.).	7.50
CHM	<b>Travel to NJ and return for meeting (4.4 hrs.) - Travel time billed at 50% of standard rates.</b>	2.20
CHM	Attend meeting in New Jersey (2.5 hrs.); review notes for J.C. meetings (.6 hrs); conference with client (.5 hrs); prepare letter to Lowenstein regarding supplemental interrogatories (.2 hrs.).	6.00
BB	Review duplicates of consultant site visit photos received from consultant (.1 hrs.); perform Internet research for photo service for exact color duplication of photos and make arrangements for same (.3 hrs.); research case indices re Grace service of interrogatories on Plaintiff ICO by former counsel for Mr. Marraro (.1 hrs.); review case record received from Pitney Hardin and collect pertinent documents (.4 hrs.); place follow up call to Ms. Heller at GNCC re status of invoices for Dr. Valera (.2 hrs.); provide guidance to Ms. Bynum re designated documents for surface water discharge project for Mr. Hughes (.2 hrs.); review new bankruptcy Amended Admin Order and incorporate into indexed case files (.3 hrs.); consult with Mr. Hughes re final versions of site sampling visit photos received from consultant (.2 hrs.); review, analyze new case documents, organize, coordinate and incorporate into indexed case files (5.3 hrs.).	7.10

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		<u>Hours</u>
05/02/02	WH Conferences with Mr. Marraro and ICO attorneys re ICO-NJDEP meeting (.6 hrs.); conferences with non-testifying expert re NJDEP site visit and related sampling issues (.8 hrs.); conferences with remediation expert re trial prep issue (.8 hrs.); conferences with Ms. Banks and non-testifying expert re production of additional site photos (.4 hrs.); draft letter to counsel for Honeywell re discovery issue (.5 hrs.); work on draft fact stipulations (4.5 hrs.).	7.60
05/03/02	MM Review case material re case management (.6 hrs.); follow-up re status of obtaining Tod Delaney's expert report and deposition transcript (.3 hrs.)	0.90
	WH Telephone conferences with non-testifying expert re NJDEP site visit and follow-up issues re same (1.2 hrs.); review surface water sampling results and confer with expert re same (.4 hrs.); conference with groundwater expert re surface water and groundwater contamination issues (.5 hrs.); review FOIA materials re chromium site and confer with Mr. Golliday re same (1.4 hrs.); review portions of Gary Walter's deposition transcript and exhibits thereto re surface and groundwater contamination issues in preparation for telephone conference with expert (2.5 hrs.); work on collecting trial exhibits and other pretrial matters (2.1 hrs.).	8.40
	BB Collect, prepare and arrange delivery of Mr. Walter's deposition transcript to Mr. Hughes (.2 hrs.); prepare surface water data packet and cover letter to Dr. Davis for Mr. Hughes (.4 hrs.); make call to Dr. Davis re scheduling time to discuss (.1 hrs.); send email message to Mr. Hughes re results. (.1 hrs.)	0.80
05/06/02	BB Review, analyze, coordinate, organize and incorporate new correspondence into indexed case files and electronic files (4.8 hrs.); place and respond to telephone calls and emails to	7.30

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Hours

experts re scheduling telephone conference for Mr. Hughes to discuss 4/17/02 site surface water data package and case developments re Honeywell's groundwater remedy proposal (.6 hrs.); scan pertinent site sampling field notes and maps and prepare email message forwarding same to expert for Mr. Hughes (.3 hrs.); organize, prepare and incorporate new court filings into indexed case files (.3 hrs.); scan, create hyperlinks of same to pleadings index.(1.3 hrs.)

05/06/02	AP	Review correspondence, including new documents produced by Honeywell.	3.00
	MM	Follow-up with Ms. Pelletier re status of obtaining documents relating to Tod Delaney (.1 hrs.); case management (.3 hrs.).	0.40
	NAB	Continue review and indexing of Honeywells Supplemental production documents.	7.50
	WH	Review field notes from site sampling event and confer with non-testifying expert re same (1.2 hrs.); conference with expert re surface water contamination issues and review his report re site visit (.7 hrs.); legal research re site remediation and surface water issue (1.3 hrs.); work on cross-examination outline and supporting documents re Honeywell expert (2.1 hrs.); work on stipulations (2.5 hrs.).	7.80
05/07/02	NAB	Continue review and indexing of Honeywells Supplemental production documents.	7.50
	CHM	<b>Travel to New Jersey and return (4.4 hrs.) - Note: Travel time billed at 50% of standard rates.</b>	2.20
	CHM	Meeting with Mr. Agnello in New Jersey regarding Answer and damages issues (4.5 hrs.).	4.50

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		<u>Hours</u>
05/07/02	MM Review recent correspondence distributed by Ms. Kelley (.2 hrs.); case management (.2 hrs.).	0.40
	WH Review letter and attachment from Honeywell re their Amended Cross-Claims and confer with Ms. Flax re same (.8 hrs.); legal research re RCRA issue related to case (1.4 hrs.); conferences with Mr. German re sampling and site visit issues (.5 hrs.); calls to Mr. Faranca re ICO meeting (.3 hrs.); conferences with Ms. Banks re assignments (.6 hrs.); conference with expert re groundwater sampling issue and review pertinent documents and data re same (2.4 hrs.); review letter from Honeywell's counsel to Mr. Faranca re Grace's surface water samples and confer with consultant re same (1.4 hrs.); work on response to Mr. Stewart's letter to NJDEP (.4 hrs.).	7.80
	BB Collect pertinent court documents, coordinate, organize and create indexed reference binder for Mr. Hughes (2.4 hrs.); conference with Mr. Hughes re assignment and scan pertinent court document into Word for Mr. Hughes (.5 hrs.); place telephone call to Ms. VanMiddlesworth re site groundwater monitoring well sampling for Mr. Hughes (.2 hrs.); consult with Ms. Kelly and arrange for proofing and quality checking of same (.2 hrs.); review new case document, scan and incorporate into indexed case files and electronic files (.4 hrs.); conference with Ms. Bynum re preparation of new case document for Mr. Hughes (.2 hrs.); collect and email pertinent contact information to Mr. Hughes (.1 hrs.); research PACER re updated case docket, download, prepare and incorporate into file (.4 hrs.); research case indices, identify, collect, coordinate and prepare pertinent correspondence re comments to NJDEP on Honeywell's RI Report for Mr. Hughes (1.3 hrs.); research case and electronic files and attorney chronological files for pertinent correspondence for Mr. Hughes (2.3 hrs.).	8.00

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		<u>Hours</u>
05/08/02	MM Review current correspondence (.4 hrs.).	0.40
	BB Complete preparation of indexed case court filings reference binder for Mr. Hughes (4.8 hrs.); collect pertinent information for Mr. Hughes (.1 hrs); research NJ web site and place calls to NJ Governor's and State Attorney General's offices re pertinent information for Mr. Hughes and email results to Mr. Hughes (.6 hrs.); research case production,, trail exhibits and case indices, collect and prepare pertinent correspondence and documents for draft of letter to NJDEP for Mr. Hughes ( 3.9 hrs.).	9.40
	WH Prepare draft letter to NJ re Honeywell's RI Report, review related documents in support of same, and confer with Mr. Marraro re letter (5.4 hrs.); work on exhibits and other trial prep matters (2.4 hrs.); confer with remediation expert re new chromium remediation technology and conduct follow-up database search re same (.8 hrs.).	8.60
	NAB Continue review and indexing of Honeywells Supplemental production documents.	7.50
05/09/02	WH Prepare letter to Mr. Stewart re Honeywell's breaches of the License Agreement and review past correspondence and other documents in connection with same (3.8 hrs.); conferences with Ms. Banks re new documents to be provided to Grace's experts (.5 hrs.); legal research re CERCLA cost recovery issue related to case (2.4 hrs.); review draft construction report produced by Honeywell and confer with expert re same (.8 hrs.); prepare letter to Honeywell requesting production of additional documents re recent site sampling and investigative matters (.8 hrs.).	8.30
	NAB Continue review and indexing of Honeywells Supplemental production documents.	4.50

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		<u>Hours</u>
05/09/02	BB Research case indices and files, collect and prepare pertinent correspondence for Mr. Hughes (4.0 hrs.); collect and prepare pertinent court papers for Mr. Marraro (.1 hrs.); research production database, Internet and Lexis for company information for Mr. Hughes (1.2 hrs.); prepare fax of recent correspondence to consultant for Mr. Hughes (.4 hrs.); consult with Mr. Hughes re supplemental production (.2 hrs.); scan new case documents, incorporate into indexed case files and electronic files and create web links to case index (.8 hrs.).	6.70
	CHM Continue to review case documents (3.5 hrs.); conference with client (.7 hrs.).	4.20
05/10/02	CHM Review depositions from insurance case (3.2 hrs); conference with Experts re invoices (1.6 hrs); conference with client (.6 hrs).	5.40
	WH Review reports and other documents recently produced by Honeywell on site sampling and remediation issues (2.1 hrs.); prepare letter to Mr. Caffrey re supplemental production of documents and coordinate service of same (1.4 hrs.); conferences with Ms. Banks re production of documents to Honeywell (.6 hrs.); factual and legal research in support of Grace's common law claims against Honeywell and collect documents supportive of same (3.8 hrs.).	7.80
	BB Prepare site sampling photos and arrange for duplicates for production (.5 hrs.); conference with Mr. Hughes and Ms. Kelly re production (.1 hrs.); incorporate production photos into indexed case files (.3 hrs.); prepare email of scanned site sampling photos to consultant (4 hrs.); prepare letter and sets of recently produced documents and FedEx package to consultant (.7 hrs.); incorporate new production documents into indexed case files, create web hyperlinks and create new files (4.3 hrs.)	6.30



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		<u>Hours</u>
05/10/02	NAB Complete work on "Surface Water Data" binders and e-mail Mr. Hughes re same (2.1 hrs.); Scan case documents (2.2 hrs.); incorporate same into electronic files (1.1 hrs.); create hyperlinks for same on the appropriate case indices (1 hrs.).	6.40
05/13/02	WH Conference with Ms. Banks re supplemental production and review documents for same (.4 hrs.); conference with expert re sediment issue and review documents received from Honeywell re same (2.2 hrs.); work on trial exhibits and direct/cross examination materials (4.5 hrs.).	7.10
	BB Analyze, prepare, organize by category and incorporate new FOIA response documents and Honeywell supplemental production documents into indexed case and electronic files and create new files as appropriate (6.8 hrs.); scan and email pertinent information re environmental company to Mr. Golladay for Mr. Hughes (.3 hrs.); incorporate new email correspondence and PARS documents into electronic files (.8 hrs.); review pretrial prep materials and information and revise pretrial preparation accordingly (2.5 hrs.).	10.40
	CHM Meeting with ICO (1.5 hrs); review discovery issues with local counsel (.8); conference with Grace counsel (.3 hrs.); conference with DEP (.5 hrs.); conference with client (.4 hrs.).	3.50
	NAB Continue review and indexing of Honeywells Supplemental production documents.	7.00
05/14/02	BB Review designated trial exhibits list and prepare list of exhibit categories for Mr. Hughes (1.3 hrs.); incorporate new docs into indexed case files, create hyperlinks and create new case files (2.6 hrs.); review trial exhibits list and prepare list of Grace Defendants issues and exhibit categories for Mr. Hughes (.5 hrs.); conference with Mr. Hughes re supplemental	7.80

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Hours

production (.1 hrs.); review and prepare FOIA request to NJDEP re clearance sites (.8 hrs.); review organize and prepare FOIA documents (.9 hrs.); prepare letters and FedEx FOIA documents to consultant and to Mr. Golladay (1.2 hrs.); make trip to FedEx re shipment of packages to consultant and Mr. Golladay for Mr. Hughes (.4 hrs.).

05/14/02	WH	Prepare letter to Mr. Stewart re sampling of groundwater well 15-MW-AA15, review pertinent documents re groundwater issue, and confer with expert re same (3.8 hrs.); review ENSOL materials and related documents re chromium remediation technology and confer with expert re potential application to site (2.8 hrs.); conference with Mr. Marraro re chromium remediation issue (.4 hrs.); review FOIA documents re neighboring chromium site received from NJDEP (.8 hrs.).	7.80
	MM	Review recent correspondence; case management.	0.60
05/15/02	NAB	Continue review and indexing of Honeywells supplemental production documents (6.2 hrs); scan correspondence and e-mail same to B. Banks (.2 hrs.).	6.40
	WH	Prepare letter to Mr. Caffrey requesting production of additional documents re various site sampling and IRM issues and review documents pertinent to same (1.2 hrs.); confer with various Grace experts re status of Honeywell's activities at the Site and prepare package of materials re same for experts (1.8 hrs.); conferences with non-testifying expert re site sampling issue and his draft letter to NJDEP re same (.8 hrs.); prepare and finalize letter to Mr. Faranca re surface water sampling issue and Judge Cavanaugh's RCRA decision (4.3 hrs.); conferences with Mr. Marraro re NJDEP letter and related matters (.5 hrs.);	8.90

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		<u>Hours</u>
	conference with Ms. Banks re database issue (.3 hrs.).	
05/15/02	CHM Trial preparation session with Mr. Agnello in New Jersey.	9.20
	CHM Travel to New Jersey and return for meeting (4.2 hrs.) - Travel time billed at 50% of standard rates.	2.10
	BB Conference with Ms. Kelly and Mr. Hughes re resolution of issues with Summation trial exhibits entries (1.9 hrs.); consult with Mr. Hughes re letter to Mr. Faranca (.1 hrs.); collect and prepare exhibits to Faranca letter (.3 hrs.); collect and prepare exhibits to Caffrey letter (.4 hrs.); respond to call from NJDEP re FOIA request for Droyers Point and make arrangements for copies (.4 hrs.); conference with Messrs. Hughes and Rielly re database for Mr. Delaney invoices (.2 hrs.); review new correspondence and case documents, coordinate, organize and prepare for incorporation into case files (2.2 hrs.).	5.40
05/16/02	TP Reviewed recent Honeywell correspondence for Mr. Hughes.	0.60
	BB Collect, organize and prepare documents re attachments to letter response to Honeywell NJDEP correspondence for Mr. Hughes and conference with Mr. Hughes re same (2.7 hrs.); conference with Ms. Bynum re letters identified for inclusion in license agreement violation issue binder (.3 hrs.); return call to consultant's office re list of documents to be distributed to Grade Defendants' experts (.1 hrs.); conference with Ms. Kelly re response letters to Messrs. Faranca and Caffrey (.3 hrs.); make call to Grace NJ office for pertinent information for Mr. Hughes and forward email message re results (.2 hrs.); read, analyze, organize, prepare and incorporate new correspondence and documents into indexed	7.40

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		<u>Hours</u>
	case file and create new pretrial issue files as appropriate (3.8 hrs.).	
05/16/02 NAB	Continue review and indexing of Honeywells Supplemental production documents (2.9 hrs.); OCR case documents and correct formatting for Mr. Hughes (2.1 hrs.).	5.00
WH	Prepare draft letter to Honeywell re breaches of License Agreement and confer with Mr. Nagy re same (3.2 hrs.); review list of additional documents to be provided to experts and confer with Ms. Banks and consultant re same (.6 hrs.); conferences with Messrs. Agnello and Marraro and Ms. Pelletier re fact stipulations and other pretrial issues (1.7 hrs.); research re Spill Act issue related to case (1.2 hrs.); work on stipulations and other matters re pretrial (1.4 hrs.).	8.10
05/17/02 NAB	Continue review and indexing of Honeywells Supplemental production documents	4.50
CHM	Review invoices from expert (.8 hrs.); conference call with ICO (.5 hrs); conference call with Mr. Agnello (.5 hrs.); review supplementary discovery from Honeywell (1.2 hrs.).	3.00
RLS	Office conference with Mr. Hughes regarding Delaney cost documents (1.2 hrs.); review Ms. Koch's Expert Report (.5 hrs.).	1.70
WH	Review cost documentation from Honeywell and confer with Mr. Smith re assignment concerning same (1.2 hrs.); confer with Mr. Marraro re fact stipulations on Mutual issues and begin working on same (2.3 hrs.); review Mutual documents in connection with preparing stipulations (1.8 hrs.).	5.30
BB	Make follow up call to Mr. Nagy re Grace letter to Honeywell for Mr. Hughes (.1 hrs.); conference with Mr. Hughes re consultant's list of documents to be distributed to experts (.1	3.30

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		<u>Hours</u>
	hrs.); make call to consultant re listed item (.1 hrs.); scan and incorporate new filing into electronic files and create hyperlink to index (3 hrs.); continue incorporating new case documents and court filings into indexed case files (2.7 hrs).	
05/19/02	RLS Review, organize and index Delaney cost documents.	6.00
05/20/02	CHM Work on witness outlines.	2.10
	NAB Continue review and indexing of Honeywells Supplemental production documents (2.3 hrs.); OCR case documents and correct formatting for Mr. Hughes (.9 hrs.); Scan case documents (.7 hrs.); incorporate same into electronic files (.7 hrs.); create hyperlinks for same on the appropriate case indices (.8 hrs.).	6.50
	BB Conference with Mr. Hughes re review of proposed stipulations and collection of referenced documents creation of indexed binder for Mr. Hughes (.2 hrs.); conference with Ms. Pelletier re same (.1 hrs.); research NJDEP Directive to Honeywell, production database, case documents, production CDs and identify and collect documents in support of Grace Defendants' draft stipulations re Mutual's knowledge for Mr. Hughes (2.9 hrs.).	3.20
	WH Review draft table re Honeywell's costs and confer with Mr. Smith re same (.5); review selected Honeywell cost documents (.6); conferences with Ms. Banks re collecting documents to support draft stipulations on Mutual knowledge issue (.5); work on draft stipulations (3.2).	4.80
05/21/02	WH Confer with Mr. Marraro re motion to amend answer and conduct research in support of same (1.6 hrs.); conferences with Ms. Banks re documents that were produced to ICO re	2.80

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		<u>Hours</u>
	November 1986 transfer of Site to ECAREG and review same (1.2 hrs.).	
05/21/02 BB	Continue researching NJDEP Directive to Honeywell, production database, case documents, production CDs, identify and collect documents in support of Grace Defendants' draft stipulations re Mutual's knowledge for Mr. Hughes (6.4 hrs.); prepare list and incorporate pertinent supporting documents on draft Stipulations (3.3 hrs.); collect, prepare, organize and coordinate referenced documents (3.8 hrs.).	13.50
05/22/02 WH	Review IRM workplan produced by Honeywell and confer with consultant re same (1.2 hrs.); work on stipulations and related matters on Mutual knowledge issue (2.7 hrs.); review new case correspondence and filings (.4 hrs.); review letter from Honeywell re supplemental production and confer with Ms. Banks re related issue (.5 hrs.).	4.80
BB	Continue reading, analyzing, collecting and preparing documents in support of draft Stipulations (5.5 hrs); update list of documents and pertinent references for Grace Defendants' pretrial stipulation of facts (2.8 hrs.); organize and coordinate documents and prepare binder for Mr. Hughes (3.9 hrs.).	12.20
RLS	Review and analyze cost documents submitted by Allied expert.	2.00
05/23/02 WH	Conferences with Grace expert and counsel for ICO re further groundwater and surface water sampling at Site (1.2 hrs.); collect and review documents re groundwater and sediment contamination issues for potential use as trial exhibits (1.6 hrs.); review latest report from Honeywell re river sediments and confer with consultant re same (.8 hrs.); work on stipulations (1.3 hrs.).	4.90

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		<u>Hours</u>
05/23/02	CHM Review hearing depositions (2.2 hrs); conference with client (.5 hrs); revise "Legal Issues" for pre-trial (1.2 hrs); review Roned cross-claims (.5 hrs); conference with Lowenstein (.2 hrs).	4.80
	MM Review recent correspondence (.3 hrs.); office conference with Mr. Marraro re pulling cases from Westlaw (.1 hrs.); search Westlaw for Mr. Marraro's review (.4 hrs.); case management (.6 hrs.).	1.30
05/24/02	CHM Conference call with consultant regarding various issues.	0.60
	AP Review construction report produced by Honeywell.	0.60
	WH Review letter from Mr. Stewart re License Agreement breaches and confer with Mr. Marraro re same (.5 hrs.); conferences with consultant re site sampling on 6/3 and related issues (.8 hrs.); work on stipulations (1.8 hrs.).	3.10
05/25/02	RLS Review and analyze cost documents submitted by Allied expert.	3.00
05/27/02	RLS Review and analyze cost documents submitted by Allied expert.	2.50
05/28/02	BB Review, analyze, coordinate, quality check proposed trial exhibits, resolve document issues, research production CDs and update exhibits list as appropriate (4.2 hrs.); prepare fax and first class mail to Mr. Stewart for Mr. Hughes (.2 hrs.).	4.40
	RLS Review email from Mr. Hughes re Honeywell expert document review progress and office conference re same.	0.50

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		<u>Hours</u>
05/28/02	MM Review recent correspondence distributed by Ms. Kelley (.3 hrs.); case management (.3 hrs.); forward e-mail to Mr. Marraro re status of damage relating documents (.1 hrs.).	0.70
	AP Review Honeywell expert deposition transcript and draft email memo regarding Honeywell production of invoices per B. Hughes.	1.10
	WH Draft letter to Mr. Stewart re Honeywell's continuing violations of the License Agreement, review documents related to same, and coordinate service of letter (2.9 hrs.); confer with consultant and his staff re groundwater issue and other technical issues concerning the site (.8 hrs.); work on stipulations and review documents in support of same (2.8 hrs.); work on selected trial prep matters and confer with Ms. Pelletier and Ms. Banks re same (2.1 hrs.).	8.70
05/29/02	AP Research (.8 hrs.); draft motion to amend answer (2.2 hrs.).	3.00
	NAB Review, index and integrate May 2002 correspondence into existing case files (4.1 hrs.); scan same and incorporate into electronic files (.9 hrs.); create hyperlinks for same on the appropriate case indices (2.9 hrs.).	7.50
	BB Conference with Mr. Hughes re supporting documents for Grace Defendants Stipulations (.1 hrs.); collect and prepare pertinent document for Mr. Hughes (.1 hrs.); quality check proposed trial exhibit documents, cross reference against exhibits list, resolve issues and correct list as appropriate (5.6 hrs.); collect and prepare pertinent document for Ms. Pelletier (.1 hrs.); conference with Mr. Hughes re future case assignment (.1 hrs.); respond to telephone message for consultant re Site groundwater sampling plan for Mr. Hughes (.2 hrs.); prepare email responses re supplemental requests (.3 hrs.).	6.50



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		<u>Hours</u>
05/29/02	WH Confer with Ms. Pelletier re drafting motion to amend (.4 hrs.); work on draft stipulations and review documents used to support same (3.2 hrs.); work on comments to Honeywell re IRM work plan and review documents re same (1.4 hrs.); legal research re possible bases for challenging Honeywell's costs and confer with paralegal re collecting documents to support same (2.3 hrs.).	7.30
05/30/02	BB Conference with Mr. Hughes re follow up with consultant re plans for Site sampling (.1 hrs.); place follow up call to consultant re same and contact with expert and consultant for Mr. Hughes (.1 hrs.); continue reviewing and quality checking designated pretrial exhibits, research case files, production database and production CDs to resolve issues, cross reference trial exhibit documents against exhibits list and make revisions (4.4 hrs.) create new case files re pre-trial issues (.8 hrs.).	5.40
	MM Office conference with Mr. Hughes re case status and up-coming assignments (.2 hrs.); case management (.3 hrs.).	0.50
	CHM Conference with client (.5 hrs); conference with experts regarding IRM issues (1.0 hrs); review EPA new guidelines on metal evaluations (1. 2 hrs.).	2.70
	NAB Review, index and integrate May 2002 Correspondence into existing case files (3.8 hrs.); scan same and incorporate into (1 hrs.) electronic files; create hyperlinks for same on the appropriate case indices (2.7 hrs.).	7.50
	WH Conferences with consultant and expert re parameters for groundwater sampling and other issues (1.3 hrs.); confer with non-testifying expert re attending groundwater sampling event at Site and issues re same (.4 hrs.); collect trial exhibits and revise database entries re exhibits (1.8 hrs.); work on deposition designation (1.3 hrs.); review selected	7.20

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		<u>Hours</u>	
	depositions from insurance coverage case to develop stipulations re Mutual knowledge issues (2.4 hrs.).		
05/30/02	RLS Continue review of Honeywell cost documents.	0.50	
05/31/02	CHM Work on damage documents (2.6 hrs.); conference with client (.5 hrs.); conference with Mr. Hughes re Honeywell cost documents (.4 hrs.).	3.50	
	AP Continue research and draft motion to amend answer.	1.40	
	WH Review groundwater remediation proposal from Honeywell and confer with experts re same (1.2 hrs.); begin preparing comments on Honeywell's remediation proposal with input from consultants (.5 hrs.); conferences with Mr. Marraro and Ms. Pelletier re motion to amend and review discovery responses in support of same (.8 hrs.); confer with Mr. Marraro re Honeywell's request for discovery conference (.2 hrs.); confer with non-testifying expert re protocol for sampling groundwater well (.3 hrs.); work on fact stipulations and RFAs re Mutual issues (.8 hrs.).	3.80	
	RLS Review, analyze and index Honeywell cost documents.	2.70	
	NAB Review, index and integrate May 2002 correspondence into existing case files (4.2 hrs.); scan same and incorporate into (1.2 hrs.) electronic files; create hyperlinks for same on the appropriate case indices (2.1 hrs.)	7.50	
06/27/02	RLS Office conference with Mr. Hughes re: review of Honeywell cost documents.	0.30	
Total Fees			<u>Amount</u> 470.30 \$111,909.00

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## Disbursements:

	<u>Amount</u>
Copy Costs - Internal	1,797.60
Facsimile Costs	127.50
Lexis Costs	380.00
Long Distance Charges	92.63
Outside Copies	186.15
Westlaw	2,362.91
 Total Disbursements	 <u>\$4,946.79</u>
Total Amount Of This Bill	<u>\$116,855.79</u>
 05/31/2002 Less Deduction of 40% of Fees Per Agreement	 <u>(\$44,763.60)</u>
Balance Due	<u><u>\$72,092.19</u></u>

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	131.50	135.00
Natasha A. Bynum, Legal Clerk	92.80	100.00
William Hughes, Counsel	148.80	350.00
Christopher H. Marraro, Partner	62.50	440.00
Mahmoude Moasser, Paralegal	5.80	135.00
Tamara Parker, Associate	0.60	270.00
Angela Pelletier, Associate	9.10	225.00
Reilly L. Smith, Paralegal	19.20	120.00

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

June 27, 2002

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12908

For Professional Services Rendered in Connection with Preparation of Fee Application to  
Bankruptcy Court - Matter 10

Professional Services:

	<u>Hours</u>	
05/20/02 CHM Prepare interim fee report.	2.50	
		<u>Amount</u>
Total Fees	2.50	\$1,100.00
Balance Due		\$1,100.00

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	2.50	440.00

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&  
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1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

June 27, 2002

W. R. Grace & Co.  
Attention: William Corcoran  
Vice President-Public & Regulatory Affairs  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12909

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

	<u>Hours</u>	
05/01/02 CHM Review document from client.	0.50	
05/02/02 CHM Conference with client.	0.50	
05/13/02 CHM Meeting with EPA staff (2.8 hrs.); review materials from client (.7 hrs.).	3.50	
05/20/02 CHM Review articles from client.	0.50	
05/30/02 CHM Review materials from client.	2.00	
		<u>Amount</u>
Total Fees	7.00	\$3,080.00
Balance Due		<u>\$3,080.00</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	7.00	440.00

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JKF)  
) (Jointly Administered)  
)  
Debtors. )

**VERIFICATION**

Christopher H. Marraro, after being duly sworn according to law, deposes and says:

1. I am a partner with the applicant firm, Wallace King Marraro & Branson, PLLC and I am a member in good standing of the bars of the State of New Jersey and District of Columbia.

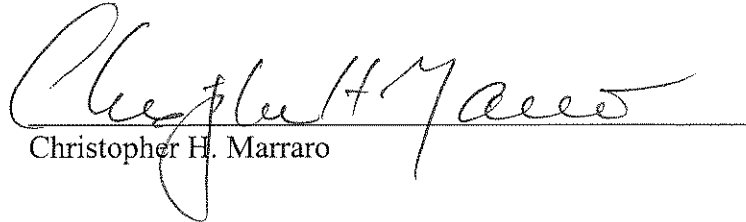
2. I have personally performed certain of, and overseen the legal services rendered by Wallace King Marraro & Branson PLLC as special litigation and environmental counsel

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.


to the Debtors and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and other persons in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

  
Christopher H. Marraro

In the District of Columbia

SWORN TO AND SUBSCRIBED  
before me this 27th day of June 2002.

  
Notary Public

My Commission Expires:

